

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

HO WAN KWOK,

*Defendant.*

Case No. 1:23-CR-118-1 (AT)

**NOTICE OF MOTION  
TO COMPEL DISCOVERY**

**ORAL ARGUMENT REQUESTED**

Defendant Ho Wan Kwok, through counsel, respectfully moves the Court, pursuant to Federal Rule of Criminal Procedure 16, for an order compelling production of all communications<sup>1</sup> and documents exchanged between the government and (i) the Chapter 11 trustee appointed to oversee the bankruptcy proceedings *In re Ho Wan Kwok, et al.*, Case No. 22-50073(JAM) (Bankr. D. Conn.) (Jointly Administered), and related cases, and his agents; and (ii) the Securities and Exchange Commission concerning the subject matter of the superseding indictment filed in this matter.

Defendant moves upon the Declaration of Matthew S. Barkan, the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior papers and proceedings had herein.

Defendant respectfully requests oral argument on this motion.

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<sup>1</sup> The communications requested in this motion include all records reflecting communications, including notes of oral communications.

Dated: September 20, 2023  
New York, New York

Respectfully submitted,



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